

Close, Timothy

From: Ellis, Danny
Sent: Monday, February 10, 2014 10:36 AM
To: Horizon Anchorage Master; Horizon Kodiak Master; Horizon Tacoma Master
Cc: Close, Timothy; Belviso, Jim; Strohla, Pete; Washburn, Edward; Johnson, Craig; Meucci, Ben
Subject: FW: Horizon Kodiak - Request for ECA Exemption on 2/5/14 - Contaminated LSFO - (with attachments)

Good morning Captains,

This is a confirmation from Sector Puget Sound given us the permission to switch over to the IFO 380 when your ship has evidence experiencing issue with the LSFO that may be contaminated with polyethylene.

If and when the chief should noticed heavy sludge during purifying process, please send photo of the sludge and notify Jim Belviso immediately so he could request the lab to conduct testing of the samples of LSFO provided from your ship during your latest bunker activity. Once the lab test is completed and if the LSFO is contaminated, then please have the chief engineer switch over to the IFO 380 in the ECA zone. For your official notification to the USCG, you are required to send in an e-mail message as per similar message that KO sent in the below e-mail chain and Tim Close will help us to provide the appropriate required info on the EPA website per EPA instruction. If you have further questions on this matter, please let me know. Thanks.

Please save the e-mail from John Winters dated Feb 10/2014 in your ECA folder. Thanks.

Regards,
Danny

-----Original Message-----

From: John.W.Winters@uscg.mil [mailto:John.W.Winters@uscg.mil]
Sent: Monday, February 10, 2014 7:49 AM
To: Ellis, Danny
Cc: Bailey, Gretchen M LCDR; Dwyer, John D CIV
Subject: RE: Horizon Kodiak - Request for ECA Exemption on 2/5/14 - Contaminated LSFO - (with attachments)

Good Morning Danny,

To the Masters and Chief Engineers of Horizon Lines D7 vessels, Until a source of non contaminated Low Sulfur Fuel Oil (LSFO) is found you are authorized to use a non compliant fuel in the ECA. When a non compliant fuel is used in the ECA log the position and time in the log. The non compliant fuel report to the EPA (the same one as last year) will need to be completed. V/R John W. Winters

-----Original Message-----

From: Ellis, Danny
Sent: Friday, February 07, 2014 1:11 PM
To: Bailey, Gretchen M LCDR
Cc: Belviso, Jim; Winters, John W CIV; Horizon Kodiak Master; SectorPugetSoundCC; Johnson, Craig; Strohla, Pete; Meucci, Ben; Close, Timothy
Subject: Re: Horizon Kodiak - Request for ECA Exemption on 2/5/14 - Contaminated LSFO - (with attachments)

Thank you for your recommendation and we'll take the appropriate action with EPA.

Tim,

Your assistance with EPA on this matter please. Thanks.

Danny

Sent from my iPhone

On Feb 7, 2014, at 12:34 PM, "Bailey, Gretchen M LCDR"
<Gretchen.M.Bailey@uscg.mil> wrote:

> Thank you all for working this out. I would definitely think about
> submitting a report to EPA on Conoco not having the fuel.
> Just a thought, I know you have a lot on your plate.
> Great work by everyone!
> GB

>

> -----Original Message-----

> From: DELLis@horizonlines.com [mailto:DELLis@horizonlines.com]

> Sent: Friday, February 07, 2014 12:26 PM

> To: Belviso, Jim

> Cc: Bailey, Gretchen M LCDR; Winters, John W CIV; Horizon Kodiak

> Master; SectorPugetSoundCC; Johnson, Craig; Strohla, Pete; Meucci,

> Ben; Close, Timothy

> Subject: Re: Horizon Kodiak - Request for ECA Exemption on 2/5/14 -

> Contaminated LSFO - (with attachments)

>

> Gretchen,

>

> Please advise us if you need further info. Thank you. I have saved 3

> small containers of the contaminated LSFO for your office and EPA.

>

> Jim,

>

> Thank you for the detailed explanation.

>

> Regards,

> Danny

>

> Sent from my iPhone

>

> On Feb 7, 2014, at 11:18 AM, "Belviso, Jim"

> <JBelviso@horizonlines.com>

> wrote:

>

>> Danny, there are three bunker suppliers in the PNW(Phillips66, Tesoro
> and US Oil). Only two of them are LSFO suppliers (Phillip66 and
Tesoro).

>>
>> Phillips66 was unable to confirm that their current LSFO does not
>> have
> the same contaminants that were in the LSFO they supplied to the
> Kodiak last week.
>>
>> Tesoro was unable to quote on the inquiry due to the short time
frame.
>>
>> Looking ahead, we will be working with Phillips66 to test a
>> different
> LSFO blend by early next week. This will prepare us for the Horizon
> Anchorage return on Friday 2/14. As a back-up plan, we have asked
> Tesoro if they can quote LSFO for delivery to the Horizon Anchorage on
2/14.
>>
>> Let me know if I can provide any additional info.
>> Regards, Jim
>>
>> -----Original Message-----
>> From: Ellis, Danny
>> Sent: Friday, February 07, 2014 1:48 PM
>> To: Gretchen.M.Bailey@uscg.mil; Winters, John W CIV; Horizon Kodiak
> Master; SectorPugetSoundCC
>> Cc: Johnson, Craig; Belviso, Jim; Strohla, Pete; Meucci, Ben; Close,
> Timothy
>> Subject: RE: Horizon Kodiak - Request for ECA Exemption on 2/5/14 -
> Contaminated LSFO - (with attachments)
>>
>> Roger on that.
>>
>> Jim Belviso,
>>
>> Please respond. Thank you.
>>
>> Regards,
>> Danny
>>
>> -----Original Message-----
>> From: Gretchen.M.Bailey@uscg.mil [mailto:Gretchen.M.Bailey@uscg.mil]
>> Sent: Friday, February 07, 2014 10:44 AM
>> To: Ellis, Danny; Winters, John W CIV; Horizon Kodiak Master;
> SectorPugetSoundCC
>> Cc: Johnson, Craig; Belviso, Jim; Strohla, Pete; Meucci, Ben; Close,
> Timothy
>> Subject: RE: Horizon Kodiak - Request for ECA Exemption on 2/5/14 -
> Contaminated LSFO - (with attachments)
>>
>> Danny,
>> Thank you for the info. However, just because Conoco does not have,
> you need to reach out to other vendors to see. We need you to have
> tried all the different vendors.

>> Just because one does not have, does not alleviate the need to get it.

>> Let me know how it turns out.

>> GB

>>

>> -----Original Message-----

>> From: DELLis@horizonlines.com [mailto:DELLis@horizonlines.com]

>> Sent: Friday, February 07, 2014 10:41 AM

>> To: Winters, John W CIV; Horizon Kodiak Master; SectorPugetSoundCC;

> Bailey, Gretchen M LCDR

>> Cc: Johnson, Craig; Belviso, Jim; Strohla, Pete; Meucci, Ben; Close, Timothy

>> Subject: RE: Horizon Kodiak - Request for ECA Exemption on 2/5/14 -

> Contaminated LSFO - (with attachments)

>>

>> Good morning Gretchen and John,

>>

>> Please be advised the Horizon Kodiak is in the process de-bunking 630

> Metric tons of the contaminated LSFO that they received from Conoco

> Phillips last week. We hope to complete the de-bunking process on to

> the barge by late this afternoon. Unfortunately, Conoco Phillips is

> not able to guarantee us with LSFO that is free from polyethylene at

> the moment.

>>

>> Captain and the Chief Engineer including us in the office have

>> decided

> not to take the risk to load the LSFO with the same base products that

> we received from Conoco Phillips last week. We (Horizon Lines and

> Conoco Phillips) hope to have this issue resolved by early next week

> prior to the Horizon Anchorage arrives on Friday 2/14. I was informed

> there are no other suppliers available to supply the Horizon Kodiak

> with the good LSFO today, therefore, the Horizon Kodiak is scheduled

> to depart from Port of Tacoma tonight at 2300 hrs for western Alaskan

> ports such as Port of Anchorage, Port of Kodiak, Port of Dutch Harbor

> and returns to Port of Tacoma by operating its main propulsion system

> with IFO 380 that has a sulfur content level of approximately 1.8 for

> this coming voyage.

>>

>> Please let me know today if you have any objection with our proposal.

>> We'll be notifying the EPA about our intention on their website as

> well Thank you.

>>

>> Regards,

>> Danny Ellis

>>

>>

>> -----Original Message-----

>> From: John.W.Winters@uscg.mil [mailto:John.W.Winters@uscg.mil]

>> Sent: Thursday, February 06, 2014 7:17 AM

>> To: Horizon Kodiak Master; SectorPugetSoundCC

>> Cc: Bailey, Gretchen M LCDR; Johnson, Craig; Ellis, Danny; Belviso, .

> Jim
>> Subject: RE: Horizon Kodiak - Request for ECA Exemption on 2/5/14 -
> Contaminated LSFO - (with attachments)
>>
>> Captain, You are authorized to burn non ECA compliant fuel in the ECA
> for the safety of the vessel. Please log the time and position so the
> when the required reports are completed that information is available.
>> V/ R John W. Winters
>>
>> -----Original Message-----
>> From: master.kodiak@horizonlines.com
>> [mailto:master.kodiak@horizonlines.com]
>> Sent: Tuesday, February 04, 2014 9:09 PM
>> To: SectorPugetSoundCC
>> Cc: Bailey, Gretchen M LCDR; Winters, John W CIV; Craig Johnson;
>> Danny
>> Ellis; JIM BELVISO
>> Subject: Horizon Kodiak - Request for ECA Exemption on 2/5/14 -
> Contaminated LSFO - (with attachments)
>>
>> Good morning,
>>
>> The MV Horizon Kodiak is requesting an Exception to the requirement
>> to
> burn low sulfur fuel oil in the North American ECA under the terms of
> MARPOL Annex VI Regulation 3.1.1
>>
>> It has been established through laboratory testing that the LSFO
> inventory currently aboard is a serious threat to the continued safe
> operation of the ship and we are requesting a one-time exception that
> will allow us to burn Heavy Fuel Oil and safely enter the Port of
> Tacoma WA on 2/6/14. Horizon Lines Purchasing Department is working
> feverishly to resolve this issue, with the goal being to debunker the
> bad LSFO and then bunker with a clean batch of LSFO on Friday, 2/7/14.
> These arrangements are ongoing. The off-grade LSFO currently in hand
> has been found to contain a high level of polymers which will cause
> severe problems with the vessel's fuel purifying system, including
> potential interruption of flow to the main engine and auxiliary
> generators. The vessel has exhausted all proper spec LSFO and only
> contains approximately 500 MT of polymer contaminated LSFO.
>>
>> Below are the specifics of our request:
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>>
>> Horizon Kodiak US Flag IMO 8419166
>>
>>
>>
>> Voyage Plan: The vessel is currently enroute from Kodiak, AK bound
> for Tacoma, WA via the Strait of Juan De Fuca and the Port Angeles
> Pilot Station. At approximately 0030 PST the vessel will enter the

> North American ECA off the west coast of Canada and will proceed 833
 > nautical miles to Tacoma, WA. The transit inside the ECA will take
 > approximately
 >> 43 hours, 30
 >> minutes.
 >>
 >>
 >>
 >> This fuel problem was first identified on Monday morning, 2/3/14 when
 > transiting from Anchorage to Kodiak, AK. Upon energizing one of the
 > LSFO purifier centrifuges, an Assistant Engineer noticed the purifier
 > experienced difficulty increasing its revolutions and began to smoke.
 >> The purifier was immediately taken off line and opened for
 inspection.
 >> (Please see attached
 >> photo's) Our Chief Engineer was aboard a sister ship when they
 > encountered contaminated LSFO with polymers approximately one year ago

 > and quickly deducted the similarities of the burnt residue. He
 > immediately contacted the company, informed the other vessels and
 > requested a specific test for polymers which was confirmed positive
 > this afternoon.
 >>
 >>
 >>
 >> Compliance attempts: At this time, we have no other source of LSFO
 > onboard except the contaminated #5 fuel oil tanks. Our other two LSFO

 > tanks that contained a clean batch of fuel are now empty.
 >>
 >>
 >>
 >> The safe and prudent operation of the vessel was called into question
 > upon receipt of the LSFO test results obtained from Oil Test Marine
 > Services.(Please see attachment) which stated: "FTIR analysis on the
 > "Toluene Insoluble" identify the materials as High Density
 > Polyethylene."
 >> Consumption of the off-spec LSFO will yield large amounts of sludge
 > that will clog our fuel purifying system and jeopardize uninterrupted
 > flow of fuel to the main engine and auxiliary generators. In other
 > words, consumption of this fuel could seriously compromise the safe
 > navigation of this vessel, and could ultimately endanger the crew and
 > environment.
 >>
 >>
 >>
 >> To ensure the continued safe operation of the vessel, the Master and
 > Chief Engineer agree that the vessel should burn only HFO until
 > additional quantities of on-grade LSFO are in hand. Upon verification

 > of appropriate spec LSFO, the re-bunkering of the ship will hopefully
 > take place at 0600 PST, Friday, 2/7/14. The sulfur content of the HFO

> to be consumed in the ECA is 1.92%.

>>

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>> Should you have any questions regarding our request, please contact

> the

>>

>> following:

>>

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>> Vessel: master.kodiak@horizonlines.com

>> Satellite

>>

>> phone: 011 870 764 575 215 cell phone:

>> 253-905-8343

>>

>>

>>

>>

>>

>> Captain Danny Ellis

>>

>> Vessel Supt: dellis@horizonlines.com

>>

>> Office phone: 253-207-4042

>>

>> Cell phone: 253-686-8228

>>

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>>

>> Please respond at your first opportunity to our request for this

> brief, one-time Exception.

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>> Thank you,

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>> Nick Christian, Master

>>

>> M/V Horizon Kodiak

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